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FILED

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RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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9 UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
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12 FUZZYSHARP TECHNOLOGIES
INCORPORATED,

13 Plaintiff,

14 vs.
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16 INTEL CORPORATION,

17 Defendant.
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CV 12 4413
Civil Action No.

COMPLAINT FOR PATENT
INFRINGEMENT AND DEMAND FOR
JURY TRIAL

DMR

19 NOW COMES Plaintiff, FUZZYSHARP TECHNOLOGIES INCORPORATED
20 ("FST"), through its attorneys, and files this Complaint for Patent Infringement and Demand for
21 Jury Trial against Intel Corporation ("Intel"). In support thereof, Plaintiff FST states as follows:
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JURISDICTION AND VENUE

1. This is an action for patent infringement of United States Patent No. 6,172,679 (hereinafter “the ‘679 Patent”), and United States Patent No. 6,618,047 (hereinafter “the ‘047 Patent”) pursuant to the laws of the United States of America as set forth in Title 35 Sections 271 and 281 of the United States Code.
2. This court has subject matter jurisdiction over this action pursuant to 28 U.S.C. Sec. 1338(a) and 28 U.S.C. Sec. 1331.
3. Venue is proper in this judicial district under 28 U.S.C. § 1391(d) and 1400 (b) because Defendant Intel has committed acts of infringement in this Federal District.
4. Plaintiff FST, is a corporation organized under the laws of the State of Nevada.
5. On information and belief, Defendant Intel Corporation (hereinafter “Intel”) has a corporate office at 2200 Mission College Blvd., Santa Clara, CA 95052.

INTRADISTRICT ASSIGNMENT

6. This is an action for Patent Infringement, which is an excepted category under Civil L.R. 3-2(c). Pursuant to Civil L.R. 3-2(c), this action is assigned on a district-wide basis.

CAUSES OF ACTION FOR PATENT INFRINGEMENT

7. On January 9, 2001, the ‘679 Patent entitled “VISIBILITY CALCULATIONS FOR 3D COMPUTER GRAPHICS”, was duly and legally issued to Hong Lip Lim, as the sole patentee.
8. The ‘679 Patent is assigned entirely to Plaintiff FST
9. Plaintiff FST is the sole owner of the ‘679 Patent, and has standing to bring this action.
10. On September 9, 2003, the ‘047 Patent entitled “VISIBILITY CALCULATIONS FOR 3D COMPUTER GRAPHICS”, was duly and legally issued to Hong Lip Lim, as the sole patentee.

1 11. The '047 Patent is assigned entirely to FST.

2 **COUNT ONE**

3 12. Plaintiff FST, repeats and incorporates herein the allegations contained in
4 paragraphs 1 through 11 above.

5 13. Defendant Intel is engaged in direct infringement of at least claim 1 of the '679
6 Patent pursuant to 35 U.S.C. § 271(a) at least with Intel® HD Graphics code name
7 "Sandy Bridge".

8 **COUNT TWO**

9 14. Plaintiff, FST, repeats and incorporates herein the allegations contained in
10 paragraphs 1 through 11 above.

11 15. Defendant Intel is engaged in direct infringement of at least claim 1 of the '0479
12 Patent pursuant to 35 U.S.C. § 271(a) at least with Intel® HD Graphics code name
13 "Sandy Bridge".
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JURY DEMAND

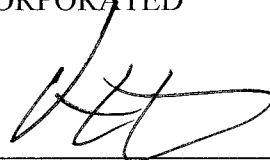
16. Pursuant to Fed. R. Civ. P. 38, Plaintiff hereby demands a jury trial as to all issues in this lawsuit.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests this Court to:

- a. Enter judgment for Plaintiff on this Complaint for the Defendant;
- b. Order that an accounting be had for the damages caused to the Plaintiff by the infringing activities of the Defendant;
- c. Award Plaintiff interest and costs;
- d. Enter a permanent injunction to enjoin the Defendant and those in privity with or acting in concert with Defendant from further infringement of the '679 Patent and the '047 patent during the remainder of respective terms for which the patents have been granted; and
- e. Award Plaintiff such other and further relief as this Court may deem just and equitable.

THE PLAINTIFF
FUZZYSHARP TECHNOLOGIES
INCORPORATED



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